

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

MRI SOFTWARE LLC,	)	Case No. 1:12-cv-01082-CAB
	)	
Plaintiff,	)	Judge Christopher A. Boyko
	)	
v.	)	
	)	<b>PLAINTIFF’S SECOND MOTION TO</b>
LYNX SYSTEMS, INC.	)	<b>COMPEL DISCOVERY OF</b>
	)	<b>DEFENDANT</b>
and	)	
	)	
DONALD ROBINSON,	)	
	)	
Defendants.	)	

Plaintiff, MRI Software LLC (“MRI”), hereby respectfully submits this Second Motion to Compel Discovery of Defendant, Lynx Systems, Inc. (“Lynx”). MRI respectfully moves the Court for an order: 1) compelling Lynx to make its witnesses available for the depositions MRI has noticed; 2) compelling Lynx to produce any remaining documents responsive to Request Nos. 7 and 17; 3) compelling Lynx to supplement its responses to Interrogatory Nos. 4, 15, 16, 20 and 21; and 4) precluding Lynx from relying on any documents to show authorization by MRI, which should have been identified long ago in response to Interrogatory No. 19; and 5) requiring Lynx to reimburse MRI’s legal fees incurred in bringing this Second Motion to Compel. Additionally, MRI respectfully requests that the deadlines for fact, expert discovery and dispositive motions set forth in the Court’s September 6, 2013 Order be extended, as they apply to MRI, for a sufficient amount of time to permit MRI to complete fact discovery of Lynx.

As set out in MRI’s attached Memorandum in Support, since this case was filed in May 2012, Lynx’s *modus operandi* has been to delay and ignore. It is now ten days past the scheduled close of fact discovery, and all of the foregoing requests are still outstanding. This is so despite Lynx’s earlier promises to provide nearly all of the discovery sought herein, promises Lynx has, without substantial justification, simply failed to keep.

Respectfully submitted,

DATED: December 12, 2013

Signature /s/ Georgia Yanchar

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2013, a true and correct copy of the foregoing was filed electronically with the Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt and parties may access this filing through the Court's System.

/s/ Georgia E. Yanchar  
One of the Attorneys for Plaintiff